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January 5, 2015

Honorable Sandra J. Feuerstein
United States District Judge
U.S. Courthouse
100 Federal Plaza
Central Islip, NY 11722

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ **JAN 21 2015** ★
LONG ISLAND OFFICE

Re: United States v. Marcos Zea
13 Cr. 072 (SJF)

Dear Judge Feuerstein:

I am attorney for defendant Marcos Zea, who is currently scheduled to be sentenced before Your Honor on January 14, 2015. By means of this letter I respectfully request an adjournment of the sentencing.

Defendant is asking for this adjournment because additional time is needed to prepare a sentencing submission for the Court on behalf of defendant Zea. Defense counsel has been working towards gathering factual material to be included in his pre-sentencing submission, and much material has been gathered, including letters from various family members, neighbors, co-workers, and other who know the defendant. Additional time is needed to gather additional material, including a review of the sentences handed down by U.S. District Courts around the nation for similar offense conduct. The request for an adjournment is also necessitated in part by counsel's other professional commitments, which include several appellate matters. (Counsel recently perfected an appeal for the Appellate Division, First Department, and is currently in the process of perfecting three additional appeals.)

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I have spoken to attorney for the government AUSA John Durham, and he advises that the government does not oppose an adjournment.

Defendant respectfully requests an adjournment to any of the following dates, if convenient to the Court: March 23, 24, 25, 26, 30, 31, April 1, 2, 6, 7, 8, 9.

I thank the Court in advance for its consideration herein.

Respectfully,



MARC BOGATIN

cc: All Counsel of Record -- via ECF

Order

The application is:

- ☒ granted *Sentencing postponed to 3/26/15 at 10:45 AM.*
- ☐ denied
- ☐ referred to Magistrate Judge *10:45 AM.* for
- ☐ decision
- ☐ report and recommendation

s/ Sandra J. Feuerstein

1/21/2015